Remarks

In the office action of March 25, 2005, the Examiner rejected claims 1, 2, 6, 8 and 9 under 35 USC §102(b) as being anticipated by Munk. Applicant respectfully traverses this rejection.

Claim 6 provides a pump with a barrel and a guide coupled to a barrel first end. Munk lacks this claimed structure. Applicant disagrees with the Examiner's characterization of Munk's coupling 6 as a guide. Rather Munk's guide is shown as component 13, which is attached to the rod coupling 14, not to the barrel. The rod coupling reciprocates with the plunger and is not coupled to the barrel. As shown in the figure of Munk, the space between the guide 13 and the well tubing 1 is small compared to the space between the rod 12 and the coupling 6. Thus, the rod 12 appears to be unable to contact the coupling 6 (and the hold down 4), further indicating that the coupling 6 does not act as a guide.

Furthermore, the top or "free" end 18 of the Munk hold down 4 is nonadjustable in distance relative to the barrel first end, as provided by claim 6. This is because the coupling 6 serves to connect the hold down 4 to the barrel 7. The barrel thus hangs from the well tubing 1 by the hold down 4, the nipple 5 and the coupling 6. The nipple 5 has stop shoulders, wherein the hold down 4 and coupling 6 are screwed onto the nipple until they contact the respective stop shoulders. Munk has no teaching or suggestion for backing off either the hold down 4 or the coupling 6 from the nipple stop

shoulders. Likewise, Munk has no teaching or suggestion for the coupling 6 backing off from full threaded engagement with the barrel 7, so that the coupling's stop shoulder no longer contacts the barrel. To back off the coupling 6, nipple 5 or hold down 4 from their threaded engagement with one another, so as to adjust the distance, would reduce the number of threads coupling these components together, with a resultant lessening of holding capability. Industry practice is to tighten threaded connections for downhole components because loose threaded connections can become worked free by reciprocation, resulting in a lost component downhole.

Nor is there any suggestion to modify Munk as per Applicant's invention because Munk limits the downward movement of the pump rod relative to the stationary members of the pump by the guide 13, as positioned on the rod 12. The top end 18 of the hold down 4 and of the barrel is fixed and stationary.

Claim 1 has been amended to correct a typographical error. Claim 1, and its dependent claims, provide a guide for reciprocation of a plunger extension member, having first and second segments, with the first segment having a first end structured and arranged to couple to a pump barrel, the second segment having a bushing stop as a second end and with the first and second segments coupled together such that the distance between the two ends can be adjusted. As discussed above, Munk's hold down 4, nipple 5 and coupling 6 do not make up a guide, but serve as a coupler. Also, as

discussed above, Munk does not teach or suggest an adjustable distance between the ends of the coupler 4, 5 and 6.

Claim 8 and its dependent claim couples a guide onto the end of the barrel. As discussed above, Munk's guide is on the reciprocating plunger components, not on the barrel. Nor does Munk teach or suggest adjusting the distance of a free end of the guide so as to adjust the size of the compression chamber. Munk teaches adjusting the length of the plunger rod 12, with the coupling 14, and does not teach adjusting the distance between the abutment 18 and the standing valve 8.

The Examiner rejected claim 4 under 35 USC §103(a) as being unpatentable over Munk, in view of Applicant's admitted prior art of Figure 3. Applicant respectfully traverses this rejection.

Claim 4 provides that the guide first segment has openings to the outside diameter. In Munk, because the hold down 4 couples the barrel to the wall tubing, there is no suggestion to put openings in the hold down. Such openings would perforate the hold down and weaken it, thereby reducing its holding capability. Nor is there any need to provide openings in the hold down because the annulus around the rod 12 allows fluid to pass through. The guide 13 that reciprocates with the plunger has openings 15, further evidencing the fact that the hold down, nipple and coupling are not a guide.

Claims 3, 5 and 7 have been objected to as being dependent upon rejected claims.

In view of the foregoing, it is submitted that all of the claims in the application are allowable, and such allowance is respectfully requested.

If any additional fees are required, please charge our deposit account number 23-2770.

Respectfully submitted,

Geoffrey A. Mantooth, Reg. No. 32,042
Decker, Jones, McMackin, McClane, Hall & Bates
Burnett Plaza, Suite 2000
801 Cherry Street, Unit #46
Fort Worth, Texas 76102
(817) 336-2400 Phone
(817) 336-2181 Fax

Attorney for Applicant

2250.08088/245973